

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Sharee L. Robinson) Case No. 19-11430
) Chapter 13 Proceedings
Debtor.) Judge Jessica E. Price Smith

**CHAPTER 13 TRUSTEE'S OBJECTION TO DEBTOR'S
MOTION TO MODIFY PLAN PRIOR TO CONFIRMATION**

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee ("Trustee") herein, by and through counsel, and hereby objects to the Debtor's Motion to Modify Plan Prior to Confirmation filed with this Court on June 14, 2019 (hereinafter "Debtor's Motion"). In support of her objection, the Trustee makes the following representations to the Court:

1. State of Ohio should be provided for in Part 3.2 of the plan and should be deleted from Part 3.1 as this is a government entity and not a contractual installment obligation. The State of Ohio should not be provided as conduit either.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtor's Motion for the reasons cited.

Respectfully submitted,

/S/ Holly Davala
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CERTIFICATE OF SERVICE

I certify that on June 19, 2019, a true and correct copy of Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Renee Heller, Attorney, on behalf of Debtor, at rhlegal@aol.com

/S/ Holly Davala

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